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JUN - 6 2013

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
MISSOURI

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

LA TONYA PATTERSON, VIVIAN PATTERSON

ON BEHALF OF MINORS: IMMP, AND VCMP

(Enter above the full name of the Plaintiff[s]
in this action.)

- VS -

1. HILLAHEALTHCARE D/B/A/2.CenterPointe Psych

Hospital et, al 3.ADAM HILLIGRANT 4.Charity

Ghitalla 5. Christopher Reynolds 6.St.Charles

Children's Division 7.Lori Harris 8.Kim Selby

8. Meika Bowden 9.Kelly Beaur 10.Helen Tucker

(Enter above the full name of ALL Defend-
ant[s] in this action. Fed. R. Civ. P. 10(a)
requires that the caption of the complaint
include the names of **all** the parties. Merely
listing one party and "et al." is insufficient.
Please attach additional sheets if necessary.

Case No. _____
(To be assigned by Clerk
of District Court)

Jury Trial Demanded

COMPLAINT

I. State the grounds for filing this case is Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

42 USC § 1983 - Civil action for deprivation of rights

Title 18, Section 242 - Deprivation of Rights Under Color Of Law

NAMES OF DEFENDENTS CONT-

11. Kenneth Simmons

12. Michael Kretzler

13. Supervisor of Michael Kretzler [Jane Doe]

14. Helen Tucker daughter [Jane Doe]

15. Pamela Ciskowski

16. Child Abuse and Neglect Hotline

II. Plaintiff, LATONYA PATTERSON resides at

PO BOX 38082, ST. LOUIS, SAINT LOUIS,
street address city county

MISSOURI, 63137, 816-824-7305.
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

VIVIAN PATTERSON MAILING ADDRESS PO BOX 300672 KANSAS CITY MO 64130

III. Defendant, HILLAHEALTHCARE D/B/A/ lives at, or its business is located at

4801 WELDON SPRING PARKWAY, SAINT CHARLES, SAINT CHARLES,
street address city county

MISSOURI, 63304.
state zip code

(if more than one defendant, provide the same information for each defendant below)

CENTERPOINTE EMPLOYEES

1. ADAM HILLIGRANT (Cert Nursing Assistant)
4801 Weldon Spring Parkway St.Charles Missouri 63304
2. Charity Ghitalla (admission clerk) 4801 Weldon Spring Parkway St.Charles
Missouri 63304
3. Christopher Reynolds (Certified Nursing Assistant) 4801 Weldon Spring Parkway
St.Charles Missouri 63304
4. CenterPointe Psych Hospital et, al 4801 Weldon Spring Parkway St.Charles
Missouri 63304
5. St.Charles Children's Division 3737 Harry S. Truman Blvd St.Charles Mo 63301

DEFENDENTS NAMES AND ADDRESSES CONT-

St. Charles Children's Division Employees

6. Lori Harris (INVESTIGATOR) 3737 Harry S. Truman Blvd St. Charles Mo 63303

7. Kim Selby (caseworker)) 3737 Harry S. Truman Blvd St. Charles Mo 63303

8. Kelly Beuar (supervisor cswkr)) 3737 Harry S. Truman Blvd St. Charles Mo 63303

9. Meika Bowden (caseworker)) 3737 Harry S. Truman Blvd St. Charles Mo 63303

St. Charles Juvenile Center 1700 South River Road St. Charles Missouri 63303

10. Kenneth Simmons (Administrative Coordinator) 1700 South River Road St.
Charles Mo 63303

11. Michael Kretzler (Juvenile Deputy Officer) 1700 South River Road St.
Charles Mo 63303

12. Supervisor Jane Doe, 1700 South River Road St. Charles Mo 63303

13. Pamela Clskowski (Guardian at Litem) 6 Westbury St. Charles Missouri 63301

14. Child Abuse and Neglect Hotline no address provided

IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

1. On, or about February 18, 2013 Charity Ghitalla, admission clerk , Christopher
2. Reynolds, Nursing Assistant, and Adam Hilligrant, Nursing Assistant all without the
3. qualifications to diagnoses psychosis and all three perform outside their scope of
4. practice, willingly signed a sworn affidavit before a St. Charles Deputy name Joseph
5. Fry and Deputy Santone which lead to me being committed against my will and my
6. son IMMP admitted against his will, and my daughter VCMP taken against her will
7. into custody where an investigator from the Children's Division Lori Harris
8. continued to make at least 22 statements on a sworn affidavit as well.
9. April 9, 2013 Lori Harris said these were "tactics and not actual truths" on February 2013 Charity
11. Ghitalla told the 11th Circuit Courts of St. Charles Missouri that "she never heard me
12. make homicidal threats to my daughter on February 18, 2013 but never addressed the
13. fact as to why she signed a sworn affidavit as though she had.
14. Christopher Reynolds never appeared for the April 9, 2013 "Contested Hearing" the
15. actions on the part of all these individuals has cause my family great harm my
16. children have been abused while in the care of a foster parent by the name of Helen
17. Marie Tucker and her daughter who often visits there are visible marking on my
18. child. My youngest has suffered emotional torture as well and food was used by
19. Helen Tucker in deprivation as a resort of discipline. March 12, 2013 Helen Tucker,
20. foster parent punished IMMP for not taking his medication as he is Autistic +

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21. cannot always remember some things she denied him usage on the computer.
22. On or about April 2013 VMMP was found on the computer after 0200 a.m. VMMP
23. was on respite care from Helens' and went bragging to the other children she" had an
24. older guy" this is supposed to be an ongoing investigation according to Kelly Beuar,
25. on the night in question VMMP told me The St. Charles Police Department and
26. Helen Tucker , and her daughter all threaten, with bodily harm to the top of VMMP
27. cranial area (visible unhealed now) threaten her five time if she resisted in giving her
28. password she gave it this is where I would like all those involve to be charged
29. criminally "assault and bodily harm with intent to coerced on a minor defenseless of
30. Protecting herself
31. Christopher Reynolds, Adam Hilligrant, and Charity Ghitalla employees signed
32. willful an sworn affidavit causing me further injury mental anguish, medical
33. malpractice, defamation of character, external injuries to my limbs, should be
34. charged with assault, and "obstruction of justice, for the loss of my children into
35. to custody by the St. Charles Lori Harris: attempting to strip away my livelihood
36. as a Certified Medication Nurse
37. Christopher Reynolds lied on a sworn affidavit on February 18, 2013 to a St.
38. Charles Deputy Joseph Fry, and Deputy Santone saying "I was homicidal"
39. leaving both officer timid of their jobs if they had allowed me to leave with my
40. children though these officer did not asked if I were homicidal or suicidal and
41. further removing the handcuffs while replacing them again I earnestly believe
42. They were in a position that what if? I am also requesting charging Christopher
43. Reynolds with assault; I did not give him permission to commit me into
44. 44. CenterPointe hospital without cause or my son Isaiah. Performing out of his

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44. CenterPointe hospital without cause or my son Isaiah. Performing out of his

45. scope of practice in diagnosing psychosis,

46. Adam Hilligrant: lied on a sworn affidavit saying "I was homicidal" leaving both

47. officer timid of their jobs if they had allowed me to leave with my children though

48. these officer did not asked if I were homicidal or suicidal and further removing the

49. handcuffs while replacing them again I earnestly believe they were In a position

50. that what if? I am also requesting charging Christopher Reynolds with assault; I

51. did not give him permission to commit me into CenterPointe hospital without cause

52. or my son IMMP. Performing out of his scope of practice in diagnosing psychosis,

53. to a St. Charles Deputy Joseph Fry, and Deputy Santone saying "I was homicidal"

54. leaving both officer timid of their jobs if they had allowed me to leave with my

55. children though these officer did not asked if I were homicidal or suicidal and

56. further removing the handcuffs while replacing them again I earnestly believe they Hilligrant,

58. Certified Nurse's Assistant with assault, performing out of his scope of

59. diagnosing psychosis; I did not give him permission to commit me into \ CenterPointe

60. Hospital without cause or my son Isaiah.

61. Charity Ghitalla for her participation in saying "I was homicidal" further signing

62. an affidavit On February 18, 2013 leaving both officer timid of their jobs if they had

63. allowed me to leave with my children though these officer did not asked if I were

64. homicidal or suicidal and further removing the handcuffs while replacing

+

IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

65. again I earnestly believe they were in a position that what if? I am also requesting

66. charging Charity Ghitalla with performing and diagnosing psychosis which is not

67. within her scope of practice practicing as "Board Certified Psychologist" without a

68. license. I am also requesting that Charity Ghitalla be charge with her part in the

69. assault, having me admitted against my will. I did not give her permission to

70. commit me into CenterPointe hospital without cause or my son IMMP.

71. out of his scope of practice in diagnosing psychosis

72. Lori Harris has attempting to railroad me in my livelihood as well I am a certification how

74. Will I provide for my family?

75. Lori Harris "violated and denied our constitutional rights by taking our children without a

76. warrant" from Honorable Judge Swann, because she felt that juveniles IMMP and

VCMP

77. in "imminent danger" based on three Adam Hilligrant, Charity Ghitalla, and Christopher

78. Reynolds who were not Certified to diagnose or determine psychosis, and later recanted

79. their testimony stating "they never heard me make homicidal threats again my child(ren

80. On April 9th 2013 in the 11th circuit court of St. Charles, Missouri.

81. Lori Harris removed my children from my care in a public place.

82. Lori Harris never contacted me or demand to see me before removing my children and

83. thus further violated the "Grandparents Rights" Law, and the Father Rights and furthermore refusing to look for the next of kin and denying when next of kin came

84. did not seek to find the nearest of kinship to the minor children before causing, undue

+

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85. duress on them.

86. Lori Harris had my son IMMP, age 12 committed into to CenterPointe Hospital causing

87. him fearing for his being IMMP both juveniles have never be removed from my care in

88. recent pass with the exception of February 18, 2013

89. Lori Harris "violated and denied our children's constitutional rights to have a parent

90. present while being interviewed"

91. VCMP age 15 was taken into custody and further subjected her to physical, verbal,

92. spiritual and emotional abuse while in the care of Helen Tucker, foster parent her

93. daughter Jane Doe 94. "My family was operating under the Color of Law during that time."

95. "No parent, grandparent in this country should have to go through this

terrible and

96. unjustified ordeal without a probably cause for a warrant from a judge and to guarantee

97. the protection of our individual constitutional rights in due process of law."

98. "We too are fighting to defend our constitutional rights and the rights of thousands of

99. American families to protect our children from the tyranny of Child Protective Services."

100. At least five holidays have gone by without me sharing this important date with

101. my children and due to Lori Harris evil intent to have padded at least 22 counts of

102. lies in her Preponderance of Evidence I am asking for jail/prison time for her and

103. at least nine others responsible for the abuse/neglect, torture, mental anguish,

104. inclusive are lying to The St Charles Deputies, and lying under other than latter

105. recanting their stories.

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106. I am asking for jail and/or prison time for Helen Tucker and her daughter Jane

107. Doe who is also responsible since February 22, 2013 of the abuse of IMMP

108. and his sibling VCMP.

109. "Under the Constitution of the United States of America all Americans have

110. the right to be free from threats, duress, coercion, or intimidation in their

111. dealings within the State."

112. Lori Harris violated my children right to have me their parent or attorney to

113. speak to her on their behalf.

114. "Due Process Clause of the Fourteenth Amendment protects the

115. fundamental right of a parent(s) to make decisions concerning the care,

116. custody, and control of their children, including medical treatment decisions"

117. "Under the Constitution of the United States of America all Americans have

118. the right to be legally protected from slanderous or libelous reports against

119. them; and the right to be able to seek real retribution for any such violations

120. against their character."

121. Lori Harris is responsible for me not being allowed to visit my children'

122. without being charged with trespassing and thus far has imposed unjustly

123. defamation of my character throughout the St. Charles Community.

124. Lori Harris also is responsible the loss of income over expenditures of money

125. that could have went towards my family

126. Lori Harris continuing her part in delaying a timely reunification after the

127. recanted testimonies of the two witness Adam Hilligrant, and Charity

128. Ghitalla current/former employees at CenterPointe

129. Pamela Ciskowski (GAL) for her participation in continuing to railroad me

130. after the fact of the matter April 9, 2013 and continuing with her parts in +

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131. a timely reunification, her lack in interviewing the children as it pertains to
132. February 18, 2013 my children are of age 15, and 12 and would have been able to
133. Convey.
134. The Juvenile Justice Center: Kenneth Simmons and Mike Kretzler for their
135. participation to continue to railroad me and participation in defamation of
136. my character thus further offer me to sign a one side "Written Agreement"
137. valid for 30 days attempts get me to agree to false allegation against me.
138. Both were aware that I never made threats of homicide to my daughter and
139. by offering me a "Written Service" agreement implies that I never made

140. threats of harming my child
141. Foster Parent: Helen Tuckers' attitude towards my son Isaiah may provoke
142. behavioral problems that we have not had in the past. (3) IMMP was
reprimanded
143. by Helen Tucker pertaining to the meeting February 28, 2013 this was told to
me
144. On March 10, 2013. (4) Helen Tucker stated to IMMP on March 10th 2013 in
145. relating to his medication which he can take with his meals are shortly
after
146. insulin, I am a Medication Tech, and this is the way his physician

147. prescribed it at Cardinal Glenn but we normally encourage not reprimand
Isaiah
Helen 149. Tucker is using food as a way to punishment for IMMP telling me what
is 150. Ongoings specifics that I could have not known about IMMP was withheld
from 151. The computer from IMMP as a tool to punish him for eating before
taking his
152. medication her words from IMMP "you are no baby!" you know to take your
153. medication before you eat!" the children have been done a terrible
injustice I
154. was given a letter from a physician Isaiah was not to be admitted into
CenterPoint
155. he did not meet the qualification someone has told both children they would
be
156. separated if they complain.

157. A memo/note was issued to the judge over this case on March 10, 2013
pertaining

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158. to the abuse but my plea went unnoticed.

159. Our telephone calls have been monitored on speaker as a way to deter both

160. children from telling me what is going on in this case verbal abuse?

161. On March 10, 2013 Isaiah has shrimp and green beans for dinner. Helen Tucker

162. is using food to punish Isaiah; Isaiah is from a generation of larger men not obese

163. simply muscular, Isaiah takes after his dad who is a stalker build.Discipline:13

164. CSR 35-60.040 Physical Standards for Foster Homes

165. March 12, 2012 (recording) Helen Tucker on goings of abuse mentally towards

166. the children on this above date Isaiah forget by (Asperger's) which is a form of

167. Autism to take his medication as a measure of punishment Helen Tucker deprived

168. IMMP of the computer IMMP has been and ongoing being treated as though he

169. should be different in lieu of his disability he was/has been treated from since

170. February 23, 2013 as if he is just slow, but St. Charles Children's Protective

171. Service and Helen Tucker have been mistreating my children and myself since

172. day February 2013 as though we our are words meant nothing and that we were

173. simply out of touch discrimination, racism is what Helen Tucker is about she does

174. the work of evil for CPS of St. Charles like hanging up the telephone while we are

175. praying, interrupting our conversation not talking of inappropriateness but saying

176. thing like talk about something else, I could understand not talking about finances

177. but when we would discuss other matters unrelated to money Helen Tucker would

178. constantly intervene negatively there were times she would be nice but other

179. times she was constantly using my call to the children as derailment by not

180. allowing me to talk with my children, she asked for me to set a time to talk with

181. the children I would set it for 2000 the calls came somewhat around the same time

182. Once and a while but then they began to shorten 5 mins or no calls at all.

183. March 2013 Helen Tucker was allowed "respite care" this gives an opportunity

184. for the foster parent to Respite Care:" Temporary or short-term home care of a

185. child that is provided, either for pay or on a voluntary basis, by adults other than

186. the birthparents, foster parents, or adoptive parents that the child normally resides

187. with, which is designed to give the parents some time away from the child, +

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188. even the child some time away from the parents, to allow them to emotionally

189. recharge and become better prepared to handle the normal day-to-day challenges

190. Of parenting."

191. Upon returning some children who reside in the home told Helen "that VCMP

192. said she is talking with an older man in Seattle Washington this is supposed to be

193. an investigation but the way some went about retrieving the passcode from

194. VCMP is horrific, abusive, and assault and battery.

195. Helen Tucker and daughters Jane Does abuse:

April 2013

196. Helen Tuckers daughter who we will identify as Jane Doe, discovered VCMP on

197. The Netbook around 0200 a.m. the St. Charles police were called and according

198. to Kelly Beaur "nine detective cars" was on the scene.

199. Jane Doe and the St. Charles police officer participated in the abuse of VCMP

200. With unhealed markings on the top of her cranial area and a swollen face

201. Upon seeing VCMP and there is recordings VCMP said to me "it was Helen

202. Tuckers' daughter who does not reside at the home of Helen Tuckers', and I asked

203. VCMP they said it would only get worse.

204. I witness" a reddened area between the frontal/parietal lobe region of my child's

205. scalp with red coloration (hemato) and whitish pulse with markings of a comb

206. that can be found in the ponytail of the hair Kelly Beaur for abetting in the abuse

207. of VCMP and IMMP including but not limited to the following this is the

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209. Hearing" she heard the witnesses Adam Hilligrant, and Charity Ghitalla state

210. "they never heard me give homicidal threats on the day of February 18, 2013

and

211. Changing their testimony still recommended the children remain in custody of
the

212. St. Charles Children's Division. Her participation and intent to railroad
me and

213. delaying a timely reunification after a lack of Preponderance of Evidence"
and

214. the testimony of caseworker II, Lori Harris who Recanted her testimony as

215. "tactics" not actual findings to have the children removed Displaced from
their

216. homes,

217. Kim Selby, caseworker who replaced [Meika Bowden] for her intent to railroad

218. me and delaying a timely reunification after a lack of "Preponderance of

219. Evidence" and the testimony of caseworker II, Lori Harris who recanted her

220. testimony as "tactics" not actual findings to have the children removed

221. displaced from their homes,

222. Meika Bowden, caseworker for her participation and knowing that Helen

223. Tucker was abusive and testified on tape that "Helen Tucker" did not usually

224. accept boys at her home for she does not like them "voice recorder" and she
also

225. stated that if the children were to go to another home for their complaints
about

226. the abuse of Helen Tuckers' they may end up in worse conditions, or

separated

227. then the talk of discussion as Meika Bowden states "sometimes children are

28. placed into cages" and her exact sometimes this happens. I am charging Mieka

229. Bowden with attempted to coerced my children into not speaking up about the +

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229. Bowden with attempted to coerced my children into not speaking up about the
230. mal- foster parenting treatment and threatening my children into not talking
to me
231. openly during visitation my children told me that "Meika Bowden told them
232. watch what you say because everything is being heard by me." I am also
charging
233. her with pulling VCMP hair (assault) Meika Bowden one of the ones pulling my
234. child's hair it was always sore to touch and VCMP indicated On another
occasion
235. during visitation in St Charles Children's Division Meika volunteered to do
her
236. hair. VCMP told me "no" "Uh" "uh" momma you do it. Meika Bowden with
237. intimidation on visits with my children statements she would say were given
my
238. children IMMP, and VMMP on our visits I am listening to everything you'll
tell
239. your momma, and told me that "everyone is not going to baby (I) MMP like
you
240. do referring to my juvenile. On visitation unlike they are now Meika would
often
241. stay in the room sitting directly across from VCMP starring at her (taped
242. conversation) how VCMP would conduct herself now.

V. Relief: State briefly and exactly what you want the Court to do for you.

1. Release my children IMMP and VCMP from custody within ten days
2. Restitution \$3,000,000,000 for my children taken away
3. Motion for Perjury for the individuals who recanted their testimony
on April 9, 2013 jail/prison time restitution \$10,000 each

VI. **MONEY DAMAGES:**

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES

☒

NO

☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$3,000,000,000 for defamation of my character , violation of our Grandparents, parental rights, injury sustaining to the children while in custody, mental stress, lose of income, loss of time with my children for holidays

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES

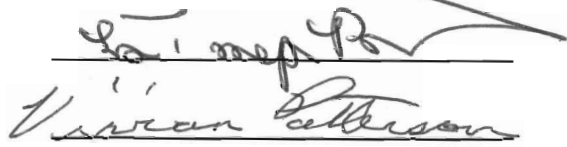
☒

NO

☐

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 6 day of June, 2013


Signature of Plaintiff(s)